

UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

UNITED STATES OF AMERICA

v.

DARRELL NELSON

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**NO. 2: 25-mj-00115-KWF**

**COUNSEL'S MOTION TO WITHDRAW**

**NOW COMES**, Darrell Nelson, Defendant in the above-captioned matter, through his counsel, Randall J. Bates, Esq., and MOVES that his counsel be allowed to withdraw:

In support of his motion the Defendant STATES:

1. Counsel was appointed to represent the Defendant in this matter.
2. Counsel is also appointed on a supervised release violation.
3. Defendant has demanded that Counsel withdraw from his cases.

This is a mandatory withdrawal under the Maine Rules of Professional Conduct Rule 1.16(a)(3).

4. In addition, it is clear, through several recent interactions, that the attorney-client relationship has irrevocably broken down. Maine Rule 1.16 Declining or Terminating Representation of the Maine Rules of Professional Conduct states in (b) that “a lawyer may withdraw from representation of a client if (1) the withdrawal may be accomplished with material adverse effect on the client; and (7) other good cause for withdrawal exists.”

5. Counsel believes that it is in the best interests of the Defendant that new counsel be appointed to assist him with this matter forthwith.

6.. Therefore, Counsel is thus requesting that he be allowed to withdraw and that Defendant be given a new CJA attorney.

5. The United States Attorney's Office, by and through AUSA Johnathan Nathans, has been notified of this motion but was not asked for a position.

**WHEREFORE** Counsel requests that this motion be granted and that counsel be allowed to withdraw.

Dated: July 10, 2025

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/s/ Randall J. Bates  
Randall J. Bates, Esq.  
Attorney for Defendant

THE BATES LAW FIRM  
P.O BOX 1146  
YARMOUTH, MAINE 04096

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused notice of the foregoing **Counsel's Motion to Withdraw** to be served on the United States Attorney's Office by ECF electronic filing as follows:

Johnathan Nathans, A.U.S.A.  
Office of the United States Attorney  
100 Middle Street Plaza, East Tower  
P.O. Box 9718  
Portland, ME 04104

Dated: July 10, 2025

/s/ Randall J. Bates  
Randall J. Bates, Esq.  
Attorney for Defendant

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